



EX PARTE OR LATE FILED

ORIGINAL

July 15, 1999

**EX PARTE PRESENTATION**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-A325  
Washington, D.C. 20554

RECEIVED

JUL 15 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: *In The Matter of Implementation of the Local competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98*

Dear Ms. Salas:

On July 13, 1999 Gary Fleming, Alan Samson, Kathy Palter, Michael Kellogg, Peter Huber, and the undersigned representing SBC met with Jake Jennings, Carol Matthey, Jerry Stanshine, Sanford Williams, Chris Libertelli, Claudia Fox, Jodie Donnova-May, Anthony Mastando, and David Kirschner representing the Policy and Program Division of the Common Carrier Bureau to discuss issues in the above referenced docket.

The SBC representatives presented an analysis of collocation costs and extended link costs. Attached to this Ex Parte letter are the documents used to facilitate this discussion.

The SBC representatives also provided the price lists for access to Operator Services and Directory Assistance platforms. Attached to this Ex Parte letter are the documents used to facilitate this discussion.

Please include this letter and attachments in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

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July 15, 1999

Ms. Salas

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Please include this letter and attachments in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew E. Brown". The signature is fluid and cursive, with a large initial "A" and "B".

Cc: Jake Jennings  
Carol Matthey  
Jerry Stanshine  
Sanford Williams  
Chris Libertelli  
Claudia Fox  
Jodie Donovan-May  
Anthony Mastando  
David Kirschner

## COLLOCATION COMPARISON

	<u>TEXAS</u>	<u>CALIFORNIA</u>
Caged:		
Average construction interval* (actuals)	90 days (1998)	107 days (June)
(tariff)	90 days	120 days
Cageless:		
Average construction interval* (tariff)	55-70 days	110 days
Average Cost (Caged)*** (100 sq. ft.)	\$995 monthly \$15,405 NRC	\$2195 monthly \$51,072 NRC \$107,634NRC **
Average Cost *** (Cageless) (4-6 bays @ 60 sq. ft.)	\$764 monthly \$10,566 NRC	\$1696 monthly \$27,552 NRC

\* These intervals assume the use of active central office space. Can be improved if CLEC meets with SBC to cooperatively plan collocation applications. The intervals for cageless are subject to approval by the state commissions.

\*\* This charge was for site preparation for the ultimate number of cages the collocation space in the office would allow. It was billed to the first collocator in the central office and then refunded by subsequent CLECs who collocated in that office until each had absorbed their proportionate share. Since the FCC issued their advance services order this practice has changed. Now, each collocator only pays for the cost to condition their individual space.

\*\*\* This is an interim rate subject to approval by the state commissions.

## DSLAM COMPARISON

SBC does not provision the DSLAMs for its competitors. CLECs provide their own DSLAM in their collocation space, whether they are in a caged or cageless environment. Therefore, this would be identical to the Collocation Comparison.

## EXTENDED LINK WITH DEDICATED TRANSPORT COMPARISON

See table below for a comparison between Texas and California rates. This analysis calculates a per loop cost for a loop provided under both collocation and extended link scenarios. Note, for Texas, Mega-Arb pricing was used. For California, OANAD pricing was used. It was assumed that inter-office mileage would be approximately eight miles, and that twenty-four loops were loaded on each DS-1. Interval varies by quantity ordered. SWC = serving wire center. Additional detail on pricing provided at the end.

Average Per Loop Costs	Texas		California		Interval days
	Mthly	NRC	Mthly	NRC	
Collocation: Loop only in same Office.	\$ 21	\$ 62	\$ 12	\$ 58	5-10
Extended Link: Loop from Distant office to collocation space in near office.	\$ 26	\$ 71	\$ 14	\$ 64	5-10
Extended Link*: Loop from SWC to CLEC switch.	\$ 29	\$ 86	\$ 30	\$ 74	5-10
Extended Link*: Loop from non-SWC to CLEC switch.	\$ 30	\$ 86	\$ 31	\$ 74	5-10

\* Extended link provided in California to collocation cages only. Prices computed here assume dedicated transport ordered separately.

### Extended link & DS1 Dedicated Transport /Texas

Link Description	Recurring	Non-Recurring	Ordering Interval
2 wire analog (basic link)	18.98	15.03	1-10 = 5 days 11-20 = 10 days 21+ = ICB
2 wire VG cross connect	2.88	47.38	Same

DS1 & DS3 Transport	DS1 Recurring	DS1 Non-Recurring	DS3 Recurring	DS3 Non-Recurring	Ordering Interval
CO to Cage Same SWC <i>IOT fixed</i> <i>UDT cross conn</i>	38.15 7.51	174.43 57.03	417.24 25.70	174.43 70.78	1-10 = 5 days 11-20 = 10 days 21+ = ICB
CO to CLEC Switch Same SWC <i>Entrance Facility</i>	83.22	310.96	286.29	395.57	Same

<b><i>IOT Fixed</i></b>	38.15	174.43	417.24	174.43	
<b><i>MUX</i></b>	81.15	96.84	365.11	777.51	
CO to Cage different SWC (8 mile avg)					
<b><i>IOT fixed</i></b>	38.15	174.43	417.24	174.43	Same
<b><i>IOT per mile</i></b>	2.80	N/A	74.32	N/A	
<b><i>UDT cross conn</i></b>	7.51	57.03	25.70	70.78	
Co to CLEC Switch Different SWC (8 mile avg)	83.22	310.96	286.29	395.57	
<b><i>Entrance Facility</i></b>	38.15	174.43	74.32	174.43	Same
<b><i>IOT fixed</i></b>	2.80	N/A	25.70	N/A	
<b><i>IOT per mile</i></b>	81.15	96.84	365.11	777.51	
<b><i>MUX</i></b>					

### Extended Link with Dedicated Transport DS1 Pricing/California

<b><i>DS1 Description</i></b>	<b><i>Recurring</i></b>	<b><i>Non-Recurring</i></b>	<b><i>Ordering Interval</i></b>
<b>Link</b>			
2 wire analog basic link	11.70	57.53	1-10 = 5 days 11-20=10 days 21+ = ICB
2 wire VG cross connect	.45	0.00	Same
<b>Transport</b>			
CO to Cage different SWC (8 mile avg)			
<b><i>IOT fixed</i></b>	32.32	140.37	Same
<b><i>IOT per mile</i></b>	1.84	N/A	
<b><i>UDT cross conn</i></b>	16.52	2.08	
Co to CLEC Switch Different SWC (8 mile avg)			
<b><i>Entrance Facility</i></b>	153.46	141.62	Same
<b><i>IOT fixed</i></b>	32.32	140.37	
<b><i>IOT per mile</i></b>	1.84	N/A	
<b><i>MUX</i></b>	255.60	97.20	

**OS  
PRICING - FACILITIES BASED  
TEXAS**

<b>A. FULLY AUTOMATED CALL PROCESSING</b>  This usage rate applies to each call that has been completed on a fully automated basis.  <div style="text-align: right;">Rate per completed automated call</div>	<b>\$0.153</b>
<b>B. OPERATOR-ASSISTED CALL PROCESSING</b>  This usage rate applies to each call that has been answered by, or forwarded to, an operator.  <div style="text-align: right;">Rate per actual work second</div>	<b>\$0.017</b>
<b>C. CALL BRANDING</b>  An initial non-recurring charge applies per TOPS switch, per brand, for the establishment of CLEC specific Call Branding. An additional non-recurring charge applies per TOPS switch, per brand, for each subsequent change to the branding announcement. Where OS is provided in conjunction with unbundled local switching, a per call charge also applies.  <div style="text-align: right;">Rate per initial load group</div> <div style="text-align: right;">Rate per load for Brand change</div> <div style="text-align: right;">Per Call<sup>1</sup></div>	<b>\$1745.00</b> <b>\$1745.00</b> <b>\$0.0312</b>
<b>D. OPERATOR SERVICES RATE/REFERENCE INFORMATION</b>  An initial non-recurring charge applies per TOPS switch, per rate schedule, for the initial load of CLEC's Operator Services Rate/Reference Information. An additional non-recurring charge applies per TOPS switch, per rate schedule, for each subsequent change to Rate/Reference Information.  <div style="text-align: right;">Rate per initial load</div> <div style="text-align: right;">Rate per subsequent rate change</div> <div style="text-align: right;">Rate per subsequent reference change</div>	<b>\$1951.83</b> <b>\$927.61</b> <b>\$927.61</b>
<b>E. INTRALATA MESSAGE RATING<sup>2</sup></b>  An initial non-recurring charge applies for the initial load of CLEC's Message Rating/Rate Schedule (OS Surcharge and intraLATA Toll Rates) information. An additional non-recurring charge applies for each subsequent change to this information.  <div style="text-align: right;">Rate per initial load</div> <div style="text-align: right;">Rate per subsequent changes</div>	<b>\$602.86</b> <b>\$602.86</b>

<sup>1</sup> Applicable when Operator Services are provided in conjunction with: i) unbundled local switch; and ii) when multiple brands are required on a single Operator Services trunk.

<sup>2</sup> Available 2nd quarter, 1997.

The terms, conditions, and prices contained herein are subject to negotiation, and therefore, subject to change or modification, until such time as both parties agree on the entire governing agreement and indicate such agreement by signing the document.

## DA

## PRICING - FACILITIES BASED

## TEXAS

<b>A. DIRECTORY ASSISTANCE (DA)</b>	
This usage rate applies to each DA call.	
Rate per call	\$0.353
<b>B. DIRECTORY ASSISTANCE CALL COMPLETION (DACC)</b>	
This usage rate applies to each DA call that has been completed to the requested number.	
Rate per completed call	\$0.240
<b>C. DIRECTORY ASSISTANCE - NATIONWIDE LISTING SERVICE</b>	
This usage rate applies to each NLS listing.	
Rate per listing	\$0.650
<b>D. CALL BRANDING</b>	
An initial non-recurring charge applies per TOPS switch, per brand, for the establishment of Call Branding. An additional non-recurring charge applies per TOPS switch, per brand, for each subsequent change to the branding announcement. Where DA is provided in conjunction with unbundled local switching, a per call charge also applies.	
Rate per initial load	\$1745.00
Rate per load for Brand change	\$1745.00
Per Call <sup>3</sup>	\$0.0312
<b>E. DA SERVICES RATE/REFERENCE INFORMATION</b>	
An initial non-recurring charge applies per TOPS switch, per rate schedule, for the initial load of Carrier's DA Services Rate/Reference Information. An additional non-recurring charge applies per TOPS switch, per rate schedule, for each subsequent change to Rate/Reference Information.	
Rate per initial load	\$1951.83
Rate per subsequent rate change	\$927.61
Rate per subsequent reference change	\$927.61

<sup>3</sup> Applicable when Directory Assistance Services are provided in conjunction with: i) unbundled local switching; and ii) when multiple brands are required on a single Operator Services trunk.

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OS  
PRICING - FACILITIES BASED  
PACIFIC

The following rates will apply for each service element:

<b>A. FULLY AUTOMATED CALL PROCESSING</b>		
This usage rate applies to each call that has been completed on a fully automated basis.		
Call Completion LATA Wide – Per MOU		\$0.00436
Rate per completed automated call		\$0.09381
<b>B. OPERATOR-ASSISTED CALL PROCESSING</b>		
This usage rate applies to each call that has been answered by, or forwarded to, an operator.		
Call Completion LATA Wide – Per MOU		\$0.00436
Rate per actual work second		\$0.02967
<b>C. CALL BRANDING</b>		
An initial non-recurring charge applies per TOPS switch, per brand, for the establishment of CLEC specific Switch Branding. An additional non-recurring charge applies per TOPS switch, per brand, for each subsequent change to the branding announcement.		
Establish/Change Switch Branding Announcement (Per Switch)		\$447.96
<b>D. OPERATOR SERVICES RATE/REFERENCE INFORMATION</b>		
An initial non-recurring charge applies per TOPS switch, per rate schedule, for the initial load of CLEC's Operator Services Rate/Reference Information. An additional non-recurring charge applies per TOPS switch, per rate schedule, for each subsequent change to Rate/Reference Information.		
Rate per initial load		N/A
Rate per subsequent rate change		N/A
Rate per subsequent reference change		N/A
<b>E. OA/DA TRUNKS</b>		
TTP6X (DS1) TTP9X (DS3)		
Trunk Installation - per trunk	First	\$500.00
	Additional	\$184.00
<b>F. BLV/I TRUNKS</b>		
TTP6X (DS1) TTP9X (DS3)		
Trunk Installation - per trunk	First	\$500.00
	Additional	\$184.00

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**DA**  
**PRICING - FACILITIES BASED**  
**PACIFIC**

<b>A. DIRECTORY ASSISTANCE (DA)</b>  This usage rate applies to each DA call.  <div style="text-align: right;"> Rate per call  Call Completion LATA Wide (per MOU) </div>	<div style="text-align: right;"> \$0.40484  \$0.00436 </div>
<b>B. EXPRESS CALL COMPLETION (ECC)</b>  This usage rate applies to each DA call that has been completed to the requested number.  <div style="text-align: right;"> Rate per completed call  Call Completion LATA Wide (per MOU) </div>	<div style="text-align: right;"> \$0.14516  \$0.00436 </div>
<b>C. DIRECTORY ASSISTANCE (Nationwide Listing Service) (NLS)</b>  This usage rate applies to each NLS listing.  <div style="text-align: right;"> Rate Per Listing </div>	<div style="text-align: right;"> \$0.82 </div>
<b>D. CALL BRANDING</b>  An initial non-recurring charge applies per TOPS switch, per brand, for the establishment of CLEC specific Switch Branding. An additional non-recurring charge applies per TOPS switch, per brand, for each subsequent change to the branding announcement.  <div style="text-align: right;"> Establish/Change Switch Branding Announcement (Per TOPS Switch) </div>	<div style="text-align: right;"> \$447.96 </div>
<b>E. DA SERVICES RATE/REFERENCE INFORMATION</b>  An initial non-recurring charge applies per TOPS switch, per rate schedule, for the initial load of Carrier's DA Services Rate/Reference Information. An additional non-recurring charge applies per TOPS switch, per rate schedule, for each subsequent change to Rate/Reference Information.  <div style="text-align: right;"> Rate per initial load  Rate per subsequent rate change  Rate per subsequent reference change </div>	<div style="text-align: right;"> N/A  N/A  N/A </div>
<b>OA/DA TRUNKS</b>  TTP6X (DS1) TTP9X (DS3) Trunk Installation - per trunk First Additional	<div style="text-align: right;"> \$500.00  \$184.00 </div>

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OS  
PRICING<sup>5</sup> – FACILITIES BASED

NEVADA

<p><b>A. FULLY AUTOMATED CALL PROCESSING</b></p> <p>This usage rate applies to each call that has been completed on a fully automated basis.</p> <p style="text-align: right;">Rate per automated call</p>	<p style="text-align: right;">\$.25</p>
<p><b>B. OPERATOR-ASSISTED CALL PROCESSING</b></p> <p>This usage rate applies to each call that has been answered by, or forwarded to, an operator.</p> <p style="text-align: right;">Rate per actual work second</p>	<p style="text-align: right;">\$.0244</p>
<p><b>C. CALL SET-UP</b></p> <p>This usage rate applies to each attempted or completed Operator Assistance call (Operator Assisted or Automated).</p> <p style="text-align: right;">Rate per attempted or completed OA call</p>	<p style="text-align: right;">\$.0057</p>
<p><b>D. LATA-WIDE CALL COMPLETION</b></p> <p>This usage rate applies to each completed Operator Assistance call (Operator Assisted or Automated).</p> <p style="text-align: right;">Rate per MOU for each completed OA call</p>	<p style="text-align: right;">\$.0120</p>

<sup>5</sup> Nonrecurring and monthly charges apply to each TOPS Access arrangement ordered.

The terms, conditions, and prices contained herein are subject to negotiation, and therefore, subject to change or modification, until such time as both parties agree on the entire governing agreement and indicate such agreement by signing the document.

DA  
PRICING - FACILITIES BASED  
NEVADA

The following rates will apply for each service element<sup>4</sup>:

<b>A. DIRECTORY ASSISTANCE (DA)</b>  This usage rate applies to each DA call.  <div>Rate per call</div>	<div>\$ .40</div>
<b>B. EXPRESS CALL COMPLETION SERVICE (ECCS)</b>  This usage rate applies to each DA call that has been completed to the requested number. <div>Rate per completed call</div>	<div>\$ .43</div>
<b>C. CALL SET-UP</b>  This usage rate applies to each attempted or completed ECCS call in addition to the ECCS per completed call rate.  <div>Rate per attempted or completed ECCS call</div>	<div>\$ .0057</div>
<b>D. LATA-WIDE CALL COMPLETION</b>  This usage rate applies to each completed ECCS call in addition to the ECCS per completed call rate and the Call Set-Up rate.  <div>Rate per MOU for each completed ECCS call</div>	<div>\$ .0120</div>

<sup>4</sup> Nonrecurring and monthly charges apply to each TOPS Access arrangement ordered.

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